



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 7
901 NORTH 5TH STREET
KANSAS CITY, KANSAS 66101

107 FEB 28 2008

CERTIFIED MAIL
RETURN RECEIPT REQUESTED
Article No. 7006 2760 0000 8652 0050

Jeff Thompson
Vice President of Manufacturing
Advanced Heat Treat Corporation
2825 Midport Blvd.
Waterloo, IA 50703

Dear Mr. Thompson:

RE: Advanced Heat Treat Corporation
2839 Burton Ave.
Waterloo, IA
RCRA ID No. IAD056504186

Letter of Warning/Request for Information

On August 15, 2007, representatives of the U. S. Environmental Protection Agency (EPA) inspected your facility. The inspection was conducted under the authority of Section 3007 of the Resource Conservation and Recovery Act (RCRA).

My staff has reviewed the inspection report and determined that violations of RCRA were documented. We are requesting additional information regarding your facility's compliance status. Enclosed is a list of violations followed by a list of questions and/or requested information. Also enclosed are instructions to be used in providing your response. Please carefully read and follow these instructions. Your response to this request in accordance with the instructions is required by Section 3007 of RCRA and substantial penalties may result from not complying. Please note that EPA reserves its right to pursue appropriate enforcement actions, including penalties, for violations discovered as a result of the inspection, regardless of whether the violations were subsequently corrected.

Within thirty (30) calendar days of receiving this letter, please mail your response to:
Edwin G. Buckner, PE, AWMD/RESP, U. S. Environmental Protection Agency, 901 N. 5th Street,
Kansas City, Kansas 66101. To request an extension of the time limit, follow the instructions in the
enclosure. Please direct all questions concerning this letter to Mr. Buckner, of my staff, at (913)
551-7621 or buckner.edwin@epa.gov.

Sincerely,

A handwritten signature in black ink, appearing to read 'Donald Toensing', with a stylized flourish at the end.

Donald Toensing

Chief

RCRA Enforcement and State Programs Branch
Air and Waste Management Division

Enclosures (3)

cc: Chief, Iowa Geological Survey and Land Quality Bureau,
Iowa Department of Natural Resources

Violations

1. A small quantity generator of hazardous waste may store hazardous waste on site for no more than 180 days without obtaining a storage permit in accordance with 40 Code of Federal Regulations (CFR) § 262.34(d). Advanced Heat Treat Corporation began storage of a container of waste NEU-TRI solvent (F001, D022, D040) on September 12, 2006. The facility generated at least 244 pounds of hazardous waste in September 2006, making it a small quantity generator. During the August 15, 2007, inspection of the facility, the EPA inspector observed this waste still in storage at the facility, 337 days after it entered storage. Advanced Heat Treat Corporation violated 40 CFR § 262.34(d).

Requested Information

1. Provide copies of the monthly solvent consumption logs from January 2003 until December 2007.
2. Provide copies of manifests or other shipping documentation for all waste solvents disposed from January 2003 until December 2007.
3. Provide documentation of weekly hazardous waste container inspections since January 2007 in accordance with 40 CFR § 265.174.
4. Provide documentation that the hazardous waste management area at your facility is equipped with an internal communications or alarm system, an on-scene device for summoning emergency assistance, portable fire extinguishers, and sufficient fire-fighting water in accordance with 40 CFR § 265.32. Such documentation could include photographs of the equipment, invoices, or copies of standard operating procedures.
5. Provide documentation that all facility communications or alarm systems, fire protection equipment, spill control equipment, and decontamination equipment has been tested and maintained as necessary to assure its proper operation in time of emergency in accordance with 40 CFR § 265.33. Such documentation could include photographs of the equipment; records of tests and maintenance; or copies of standard operating procedures.
6. Provide documentation that employees pouring, mixing, spreading or otherwise handling hazardous waste have immediate access to a communications device or alarm in accordance with 40 CFR § 265.34. Such documentation could include photographs of the equipment or copies of standard operating procedures.
7. Provide documentation of arrangements your facility has made with local authorities in accordance with 40 CFR § 265.37.
8. Provide documentation of the identity of the facility's emergency coordinator in accordance with 40 CFR § 262.34(d)(5)(i).
9. Provide documentation that the information required by 40 CFR § 262.34(d)(5)(ii) is posted by the telephone. Such documentation could include photographs of the posted information or copies of standard operating procedures.

3007 RESPONSE INSTRUCTIONS

Identify the Person(s) responding to this request on your behalf.

Address each numbered item separately, and precede each answer with the number of the item to which it responds.

For each numbered item, identify all documents consulted, examined, or referred to in the preparation of the answer, or that contain information responsive to the requested item. Provide true, accurate, and legible copies of all such documents. (If information responsive to an item is available but there are no relevant source documents, you must still provide the information.)

For each document provided, indicate on the document (or in some similar manner) the number of the item to which it responds.

For each numbered item, identify all persons consulted in the preparation of the answer.

For purposes of this request, the term "you" or "your" refers to the company, corporation and any officer, principal, agent employee, or any other person(s) associated in any capacity.

If information responsive to a requested item is not in your possession, identify the person(s) from whom the information may be obtained.

If information that is not known or available at the time you make your response later becomes known or available to you, you must supplement your response.

If, at any time after you submit your response, you find that any part of the information you submitted is incomplete, false, or misrepresents the truth, you must notify the EPA immediately.

You must provide the requested information even though you consider it confidential information or trade secrets. If you want to make a confidentiality claim covering part or all of the information submitted, identify the material with words such as "trade secret," "proprietary," or "company confidential."

The EPA will disclose this information only to the extent and by the means described in 40 CFR Part 2, Subpart B., provided that it qualifies as confidential business information.

A request for an extension to the time limit for responding must be in writing and must be postmarked within five (5) calendar days of receipt of this information request. Address it to the person identified in the cover letter to receive your response.

Copies of the Code of Federal Regulations may be obtained from the U.S. Government Bookstores or on the Internet at www.epa.gov/epahome/cfr40.htm.

This request for information is not subject to the approval requirements of the Paperwork Reduction Act of 1980.

The EPA encourages you to conserve resources. Suggested methods include use of recycled paper, printing on both sides (duplex printing), and when possible submitting documents electronically (i.e., email or compact discs). If hard copy submittals are necessary, please do not submit documents in binders.

Not responding to this information request within the stated time limit and in accordance with these instructions may subject your facility to an enforcement action which could include the imposition of penalties of up to \$32,500 per violation, per day of continued noncompliance. Providing false, fictitious, or fraudulent statements or representations could lead to criminal penalties.